

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	20-CR-10098 (WGY)
)	
BRIAN GILBERT,)	
)	
Defendant.)	

**DECLARATION OF MIRANDA KANE IN SUPPORT OF
DEFENDANT BRIAN GILBERT'S SENTENCING MEMORANDUM**

I, Miranda Kane, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am counsel for Brian Gilbert in the above-captioned matter and was granted leave to appear *pro hac vice* by order of the court on September 3, 2020. (Dkt. Entry. 9) I have personal knowledge of the information set forth herein.
2. Attached as **Exhibit 1** is a true and accurate copy of letters of support on Mr. Gilbert's behalf—from family, friends, former colleagues, and others—and a letter from Mr. Gilbert to the Court. With the exception of Mr. Gilbert's letter, the letters comprising Exhibit 1 were authored in the Fall of 2022, when Mr. Gilbert was still believed to be cancer-free and sentencing was scheduled for November 3, 2022.
3. Attached as **Exhibit 2** is a true and accurate copy of photographs of various awards and accolades that Mr. Gilbert earned during his career in law enforcement.
4. Attached as **Exhibit 3** is a true and accurate copy of a letter from a Deputy District Attorney of Santa Clara County to the Santa Clara Police Department's Chief of Police, commending Mr. Gilbert for his assistance in a prosecution.

5. Attached as **Exhibit 4** is a true and accurate copy of correspondence from the District Attorney of Santa Clara County and a Deputy District Attorney to the Santa Clara Police Department's Chief of Police, praising Mr. Gilbert for his assistance in several different prosecutions.
6. Mr. Gilbert and his wife have taken out a home equity line of credit and borrowed approximately \$30,000 from Mr. Gilbert's mother to help defray medical costs associated with Mr. Gilbert's cancer treatment. Mr. Gilbert is prepared to submit supporting financial documentation if the Court so desires.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of July, 2024 at San Francisco, California.

/s/ Miranda Kane
MIRANDA KANE

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-participants on July 12, 2024.

/s/ Douglas S. Brooks
Douglas S. Brooks